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**Steptoe**

## MEMO ENDORSED

October 8, 2024

### Via ECF

Hon. Edgardo Ramos  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Defendants are directed to respond by October 11, 2024.  
SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: October 9, 2024

New York, New York

**Re:** *Revlon Consumer Products LLC, et al. v Give Back Beauty S.A., et al.*,  
Case No. 1:24-cv-06438-ER-RWL

Dear Judge Ramos:

We represent Plaintiffs Revlon Consumer Products LLC (“Revlon”) and Elizabeth Arden, Inc. (“Elizabeth Arden”) in this action. As the Court may recall, during the hearing held on September 25, 2024, Defendants used a PowerPoint presentation (and made certain arguments) excerpting and repeating information in documents designated by Plaintiffs as Attorneys’ Eyes Only under the Stipulated Protective Order and filed under seal. That PowerPoint presentation was distributed to counsel and the Court. The PowerPoint document itself bears no indication that it contains Attorneys’ Eyes Only material.

Following the hearing, we requested that Defendants add an Attorneys’ Eyes Only designation to the confidential portions of the PowerPoint, in accordance with their obligations pursuant to Paragraph 14 of the Protective Order to “take all due precautions to prevent the unauthorized or inadvertent disclosure of such material.”<sup>1</sup> Defendants refused. In order to prevent the unintended disclosure of protected information, we ask that the Court maintain under seal slides 5, 14, 17, and 18 of Defendants’ presentation – all of which reflect information derived from a Revlon agreement designated as Attorneys’ Eyes Only and filed under seal. (*See* ECF No. 44-13).

Respectfully submitted,

s/ Elyse D. Echtman  
Elyse D. Echtman

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<sup>1</sup> Plaintiffs are attempting to work with Defendants regarding designating the portions of the hearing transcript that should be maintained under seal.